



February 29, 2024

ECF & MAIL

Hon. Margaret M. Garnett
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Escobar v. Correa, et al., 22-cv-8434 (MMG)(VF)

Dear Judge Garnett:

This Firm represents Defendant Luis Correa, in the above-referenced action, which was recently reassigned to Your Honor. (ECF 69). Pursuant to Your Honor's Individual Rules & Practices ("Rule"), Section II.B.3, we enclose two courtesy copies of the complete set of the motion to dismiss filed by Defendant Correa (ECF 63, 64, 68, and 70).

Additionally, we write to request oral argument. Pursuant to Rule II (A)(4), we note that the argument would be handled by Kimberly Friedman, Senior Counsel at this Firm. Although Ms. Friedman is not a junior attorney, the majority of her career was at a large law firm, where she was unable to benefit from the opportunity to argue motions. Ms. Friedman played a substantial role in drafting the motion papers at issue. Additionally, this matter comes to my firm through federal regulations that permit the representation of private counsel at the federal government's expense. (*See* CFR § 50.16). The Firm takes on these quasi-pro bono matters in part for the increased opportunity for courtroom experience.

We thank you in advance for your consideration of this request.

Respectfully,


Silvia L. Serpe

Encl. (by mail only)